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IN RE: FACEBOOK, INC. CONSUMER  
PRIVACY USER PROFILE LITIGATION,

This document relates to:

ALL ACTIONS

CASE NO. 3:18-MD-02843-VC

**DECLARATION OF SONAL N. MEHTA  
IN SUPPORT OF FACEBOOK, INC.'S  
OPENING BRIEF IN SUPPORT OF ITS  
CLAIM OF CONFIDENTIALITY**

I, Sonal N. Mehta, hereby declare as follows:

1. I am a partner at the law firm of Wilmer Cutler Pickering Hale and Dorr LLP. I am an attorney at law licensed to practice in the state of California. I submit this declaration in support of Facebook's Opening Brief in Support of its Claim of Confidentiality, filed contemporaneously herewith. I make this declaration from personal knowledge, and if called to testify, I could and would testify competently thereto.

2. I am counsel of record for Defendant Facebook, Inc. in the matter of *Six4Three, LLC v. Facebook, Inc.*, No. CIV533328 (Cal. Super. San Mateo Cnty.) ("Six4Three").

3. The plaintiff in *Six4Three* is an app development company that alleges Facebook wrongfully terminated access to certain API endpoints.

4. Under the protective order entered in *Six4Three*, Facebook has produced over one million pages of documents designated "Confidential" or "Highly Confidential—Attorneys Eyes Only." Nearly 7,000 pages of documents sourced from the *Six4Three* litigation have been leaked and published online. I have been informed that the 46 documents at issue in the brief that this declaration supports were produced in *Six4Three* under the protective order and were subsequently leaked.

5. A true and correct copy of excerpts of the Stipulated Protective Order, entered by Judge Karesh on October 24, 2016 in *Six4Three*, is attached hereto as **Exhibit 1**.

6. A true and correct copy of excerpts of the transcript of the November 30, 2018 hearing before Judge Swope in *Six4Three* is attached hereto as **Exhibit 2**.

7. A true and correct copy of excerpts of the Order Re: Defendant Facebook Inc's Motion to Open Discovery and to Compel, entered by Judge Swope on March 15, 2019 in *Six4Three*, is attached hereto as **Exhibit 3**. That order is currently under reconsideration by Judge Buchwald, who is now presiding over the *Six4Three* litigation.

8. A true and correct copy of excerpts of the Order for Briefing and Staying Submission of Unredacted Copies of Sealed Documents, entered by Judge Swope on November 20, 2018 in *Six4Three*, and its accompanying exhibits, are attached hereto as **Exhibit 4**.

9. A true and correct copy of excerpts of the November 26, 2018 Declaration of Theodore Kramer in support of Six4Three, LLC's Brief in Response to the Superior Court's November 20, 2018 Order, and accompanying exhibits, as filed in *Six4Three*, are attached hereto as **Exhibit 5**.

10. A true and correct copy of excerpts of the Amended Order on Facebook's Motions to Seal, entered by Judge Swope on November 1, 2018 in *Six4Three*, is attached hereto as **Exhibit 6**.

11. A true and correct copy of excerpts of the Order Denying Defendant Facebook, Inc.'s Ex Parte Application, entered by Judge Swope on November 30, 2018 in *Six4Three*, is attached hereto as **Exhibit 7**.

12. A true and correct copy of excerpts of the Order No. 2 Re: Destruction or Return of Facebook Information and Certification, entered by Judge Swope on January 16, 2019 in *Six4Three*, is attached hereto as **Exhibit 8**.

13. A true and correct copy of the minutes of the July 17, 2020 case management conference before Judge Buchwald in *Six4Three* is attached hereto as **Exhibit 9**.

14. A true and correct copy of the May 30, 2018 Declaration of Laura E. Miller in support of Facebook's Motion to Seal, as filed in *Six4Three*, is attached hereto as **Exhibit 10**.

15. A true and correct copy of excerpts of the Joint Submission No. 2 in Response to Order Setting Case Management Order (Short Neutral Statement of the Case), as jointly filed by the parties on February 25, 2020 in *Six4Three*, is attached hereto as **Exhibit 11**.

16. A true and correct copy of excerpts of the transcript of the March 15, 2019 hearing before Judge Swope in *Six4Three* is attached hereto as **Exhibit 12**.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is to the best of my knowledge and belief true and correct. Executed on March 19, 2021 in Redwood City, California.

  
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/s/      Sonal N. Mehta